

# EXHIBIT J

**IN THE MATTER OF AN ARBITRATION  
UNDER THE UNCITRAL ARBITRATION RULES BETWEEN**

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**TELENOR MOBILE COMMUNICATIONS AS,**

Claimant,

Snarøyveien 30  
N-1331 Fornebu  
Norway

-and-

**STORM LLC,**

Respondent,

1 Narodnogo Opolchennya Street,  
Kyiv 03151  
Ukraine

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**DECLARATION OF ANNA-MARTA KHOMYAK IN SUPPORT OF STORM LLC'S  
MOTION TO DISMISS FOR LACK OF JURISDICTION**

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Anna-Marta Khomyak declares under penalty of perjury as follows:

1. I am a senior associate at Magister & Partners, 20, Velyka Zhytomyrska St., Kyiv, 01025, Ukraine, attorneys for Respondent Storm LLC ("Storm") in the above-captioned arbitration.

2. I submit this declaration in support of Storm's motion to dismiss the claims currently pending before the Arbitral Tribunal. The purpose of this affidavit is to place before the Tribunal copies of the court files of the April 25, 2006 Order of the Kyiv Commercial Court, as well as the May 25, 2006 Ruling of the Kyiv Commercial Court of Appeals that are relevant to Storm's motion (the "April 2006 Order" and "May 2006 Ruling").

3. Annexed hereto as Exhibits 1 to 32 are true and correct copies of the case file (no. 40/242) of the April 2006 Order and May 2006 Ruling. Under the instructions on record-keeping in the Commercial Court of Ukraine, as issued and approved by the Highest Commercial Court of Ukraine, by a Decree dated December 10, 2002, no.75, the case files are to be examined by the parties in the court office, and in the presence of the court officer. Therefore, since the files may not be taken out of the court office, the copies exhibited herein, while true and correct, are photographic copies taken onsite. English translations have been provided by Magister & Partners for those documents in the original Ukrainian language.

4. Annexed hereto as Exhibit 1 is a copy of the cover page of Volume 1 of Case File 40/242.

5. Annexed hereto as Exhibit 2 is a copy of the list of documents of Volume 1.

6. Annexed hereto as Exhibit 3 is a copy of the Order on the commencement of the Proceeding in Case 40/242.

7. Annexed hereto as Exhibit 4 is a copy of the Statement of Claim of Alpren Limited dated April 10, 2006, with exhibits.

8. Annexed hereto as Exhibit 5 is the Application for a claim extension by Alpren Limited dated April 18, 2006, with exhibits.

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9. Annexed hereto as Exhibit 6 is a copy of the Shareholders Agreement dated January 30, 2004.

10. Annexed hereto as Exhibit 7 is the cover page of Volume 2 of Case File 40/242.

11. Annexed hereto as Exhibit 8 is Storm LLC's Application for Examination of Case File 40/242 dated July 17, 2006.

12. Annexed hereto as Exhibit 9 is a list of documents in Volume 2 of Case File 40/242.

13. Annexed hereto as Exhibit 10 is a copy of Storm LLC's Charter dated February 15, 2006.

14. Annexed hereto as Exhibit 11 is a copy of Storm LLC's Charter as of June 26, 2002.

15. Annexed hereto as Exhibit 12 is a copy of Amendments and addenda no.3 to Storm LLC's June 26, 2002 Charter, dated September 24, 2004.

16. Annexed hereto as Exhibit 13 is a copy of Amendments and addenda no.2 to Storm LLC's June 26, 2002 Charter, dated July 13, 2004.

17. Annexed hereto as Exhibit 14 is a copy of Amendments and addenda no.1 to Storm LLC's June 26, 2002 Charter, dated October 10, 2002.

18. Annexed hereto as Exhibit 15 is a Certificate of State Registration of Storm LLC dated June 23, 1995.

19. Annexed hereto as Exhibit 16 is a Reference from the State Committee of Statistics of Ukraine on Storm LLC dated February 21, 2006.

20. Annexed hereto as Exhibit 17 is a copy of the Minutes of Meeting of Storm LLC's Equity Holders (Shareholders), dated February 8, 2006.

21. Annexed hereto as Exhibit 18 is a copy of a Power of Attorney from Alpren Limited dated April 7, 2006.

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22. Annexed hereto as Exhibit 19 is an Application by Alpren Limited regarding its legal status dated April 21, 2006.

23. Annexed hereto as Exhibit 20 is an Application by Alpren Limited on the jurisdiction of the court, dated April 21, 2006.

24. Annexed hereto as Exhibit 21 is a copy of the Minutes of the Kyiv Commercial Court hearing on April 21, 2006.

25. Annexed hereto as Exhibit 22 is a copy of the Minutes of the Kyiv Commercial Court hearing on April 25, 2006.

26. Annexed hereto as Exhibit 23 is a copy of the Order of the Kyiv Commercial Court dated April 25, 2006.

27. Annexed hereto as Exhibit 24 is a copy of the cover letter from the Kyiv Commercial Court dated May 7, 2006.

28. Annexed hereto as Exhibit 25 is the Order from the Kyiv Appellate Commercial Court dated May 19, 2006.

29. Annexed hereto as Exhibit 26 is a copy of the Petition of Appeal from Storm LLC dated May 16, 2006.

30. Annexed hereto as Exhibit 27 is a copy of the Directive of the head of the Kyiv Commercial Court of Appeals dated May 24, 2006.

31. Annexed hereto as Exhibit 28 is a copy of the Minutes of the Kyiv Commercial Court of Appeals hearing dated May 25, 2006.

32. Annexed hereto as Exhibit 29 is the Ruling of the Kyiv Commercial Court of Appeals dated May 25, 2006.

33. Annexed hereto as Exhibit 30 is a copy of the cover letter from the Kyiv Commercial Court of Appeals dated May 29, 2006.

34. Annexed hereto as Exhibit 31 is the Decree of the Kyiv Commercial Court of Appeals on the compulsory enforcement of the May 25, 2006 decision, dated June 19, 2006.

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35. Annexed hereto as Exhibit 32 is the Signature of Mr. Kliuchkovskiy (associate at Magister & Partners) regarding the examination of the case file, dated August 4, 2006.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 8 at Kyiv, Ukraine.

A handwritten signature in cursive script, appearing to read "Anna-Marta Khomyak", written above a horizontal line.

Anna-Marta Khomyak